```
FISHER & PHILLIPS LLP
     SCOTT M. MAHONEY, ESQ.
 2
    Nevada Bar No. 1099
     ALLISON L. KHEEL, ESQ.
 3
    Nevada Bar No. 12986
    300 S. Fourth Street
     Suite 1500
 5
    Las Vegas, NV 89101
     Telephone: (702) 252-3131
 6
    E-Mail Address: smahoney@fisherphillips.com
    E-Mail Address: <a href="mailto:akheel@fisherphillips.com">akheel@fisherphillips.com</a>
    Attorney for Defendant K-Kel, Inc.
 8
 9
                       UNITED STATES DISTRICT COURT
10
                                DISTRICT OF NEVADA
11
                                                 Case No.: 2:21-cv-00639-JCM-BNW
     JULIE HANNA,
12
13
                         Plaintiff,
                                                  STIPULATION AND ORDER TO
                                                        EXTEND TIME FOR
14
                                                   DEFENDANT K-KEL INC. TO
           VS.
                                                     ANSWER OR OTHERWISE
15
     K-KEL, INC., a Nevada Corporation;
                                                  RESPOND TO FIRST AMENDED
    DOES I-X; and ROE Business Entities I-X,
                                                            COMPLAINT
16
17
                      Defendants.
                                                            (First Request)
18
19
           The parties, by and through their undersigned counsel, hereby stipulate to
20
     extend the deadline within which Defendant K-Kel, Inc. ("Defendant") may file its
21
     Answer or otherwise respond to Plaintiff's First Amended Complaint to February 14,
22
            This is the first request for an extension of the time to answer the First
23
24
     Amended Complaint in this matter. The parties are not presently seeking an extension
25
    of the overall discovery deadline.
26
    ///
27
     ///
28
     FP 43093882.1
```

Discovery Completed to Date

The parties have exchanged initial disclosures pursuant to FRCP 26(a)(1). Plaintiff has served written discovery upon the Defendant, and Defendant has provided responses. Defendant has served written discovery on Plaintiff and responses are not yet due. Defendant has subpoenaed five sets of medical records. Plaintiff has served an expert witness report and Defendant has identified an expert it would like to use. Plaintiff has noticed the deposition of Kevin Kelly for Thursday, February 17, 2022.

Discovery Remaining to Be Completed

In addition to general complications from dealing with the global pandemic and restrictions of COVID-19, Plaintiff's contested motion to file a First Amended Complaint was granted on January 20, 2022 (ECF No. 39), adding three individual defendants to the case, which have yet to be served and have not yet had time to answer or appear in this case. Additional discovery as to these individuals will need to wait until such time as they have appeared in the case, and pending discovery may also be delayed as the new individual defendants should be permitted the opportunity to participate in discovery and defend the depositions in order to avoid duplication of efforts.

Reason for Requested Extension

Defendant, K-Kel requested this extension of the answer deadline to permit Defendant additional time to file objections to the Order which otherwise would be due on the same day, and Defendant also wanted additional time to see if individual defendants had been served and retained counsel.

27 /// FP 43093882.1

///

25 26

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

28

FP 43093882.1

1	This extension is sought in good faith and should not prejudice the rights of any	
2	party in this case or cause undue delay.	
3	Dated this 11th day of February, 2022.	
4	FISHER & PHILLIPS, LLP	GILBERT EMPLOYMENT
5	TISTIER & THEELITS, EET	LAW, P.C.
6	/s/ Allison L. Kheel, Esq	/s/ Kathryn Black, Esq.
7	Scott M. Mahoney, Esq. Allison L. Kheel, Esq.	Kathryn Black, Esq. (<i>Pro Hac Vice</i>) Gary M. Gilbert, Esq., (<i>Pro Hac Vice</i>)
8	300 S. Fourth Street, Suite 1500	1100 Wayne Ave., Ste. 900
9	Las Vegas, NV 89101 Attorneys for Defendant, K-Kel,	Silver Spring, MD 20910
10	Inc.	JAMES P. KEMP, Esq.
		KEMP & KEMP 7435 West Azure Drive, Suite 110
11		Las Vegas, NV 89130
12		Attorneys for Plaintiff
13		·
14	I	T IS SO ORDERED.
15		Berbweter
16	Ţ	JNITED STATES MAGISTRATE JUDGE
17	_	February 14, 2022
18	Ι	DATED
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		